I oppose RM-10413. Any "congestion" on the phone sub-bands is more the result of poor operator practice and the over-abundance of totally unregulated "contests" than of having too many users for a limited spectrum. If this spectrum re-allocation is approved, beginning-level and slow-speed CW operators will disappear from the face of the earth because they will no longer have that small segment of spectrum where they can practice their craft undisturbed.

For the record, I am an ARRL member.

Thank you for allowing my voice to be heard.

Brian Davis, KG9DU